

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
vs.) NO. 04-30004-MAP
)
ROOSEVELT ARCHIE)

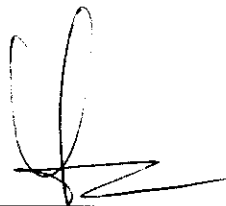
**MOTION TO RECONSIDER MAGISTRATE'S ORDER
REVOKING DEFENDANT'S RELEASE ON BOND**

Now comes the defendant in the above entitled matter and moves this Honorable Court for an order reconsidering its decision to revoke the defendant's release on conditions. As his basis, therefore, asserts that upon information and belief, defendant, Roosevelt Archie, is a person in need of treatment for substance abuse. Counsel for defendant has conferred with defendant's mother, Assistant United States Attorney, Paul Smyth, Esq., and Pretrial Services Officer, Irma Zingarelli. All parties agree the defendant should be assessed in a controlled program to determine an appropriate treatment mode. Pretrial services has informed the defendant that within 48 hours space in one of two federally supervised programs will become available.

WHEREFORE, defendant moves this Honorable Court to reconsider its original order revoking conditions of release in order to permit the defendant to be assigned to a treatment program.

Counsel for defendant has conferred with all interested parties who have expressed no objection to the allowance of this motion.

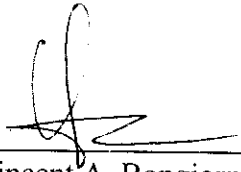
THE DEFENDANT



BY: _____
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CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing to the Assistant United States Attorney, Paul Smyth, Esq., and PreTrial Services Officer, Irma Zingarelli, United States District Court, 1550 Main Street, Springfield, Ma. 01103 this 21st day of December, 2004.



Vincent A. Bongiorno